

BAKER DECLARATION
EXHIBIT G

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON,)
)
 PLAINTIFF,) NO. 3:17-CV-05806-RJB
)
 VS.)
)
 THE GEO GROUP, INC.,)
)
 DEFENDANT.)
)
)
)

DEPOSITION UPON ORAL EXAMINATION OF
WILLIAM A. MCHATTON

10:00 A.M.

FEBRUARY 1, 2019

800 FIFTH AVENUE, SUITE 2000

SEATTLE, WASHINGTON



REPORTED BY: BETSY E. DECATER, RPR, CCR 3109



A P P E A R A N C E S

FOR THE PLAINTIFF:

MARSHA CHIEN
ANDREA BRENNEKE
LA ROND BAKER
Assistant Attorney Generals
Office of the Attorney General
800 Fifth Avenue, Suite 2000
Seattle, Washington 98104
(206) 464-7744
andreab3@atg.wa.gov
larondb@atg.wa.gov
marshac@atg.wa.gov

FOR THE DEFENDANT:

MICHAEL PUSATERI
Greenberg Traurig
2101 L Street, N.W.
Suite 1000
Washington, D.C. 20037
(202) 533-2354
pusaterim@gtlaw.com

ALSO PRESENT: CAITIE HALL



1 Q. So --

2 A. Did I tell anybody that I was going to be going
3 to a deposition?

4 Q. Did you discuss the details of what you might
5 testify to?

6 A. No.

7 Q. Did you speak with any ICE employees?

8 A. No.

9 Q. Did you speak with any ICE attorneys?

10 A. No.

11 Q. How long were you employed by The GEO Group?

12 A. From February 9th, 2004 through I believe my
13 resignation date, retirement date was like August 28th,
14 2018.

15 Q. What positions did you hold during your
16 employment at The GEO Group?

17 A. I was the facility's first compliance manager and
18 then was promoted to the associate warden security in, I
19 believe, 2010.

20 Q. And during your employment for The GEO Group
21 where were you located?

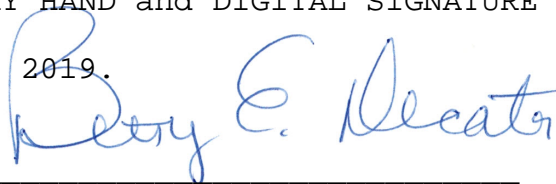
22 A. Originally -- the facility did not open until
23 April 23rd, 2004. The original location of the facility
24 for ICE detention was in Seattle on Airport Way, and I
25 had to prepare the manuals, the policies and procedures



REPORTER'S CERTIFICATE

I, BETSY E. DECATER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the State of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was reserved; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and DIGITAL SIGNATURE this 13th day of February, 2019.



BETSY E. DECATER, RPR
Washington Certified Court Reporter, CCR 3109
bdecater@yomreporting.com

